

**Federal Defenders
OF NEW YORK, INC.**

Southern District
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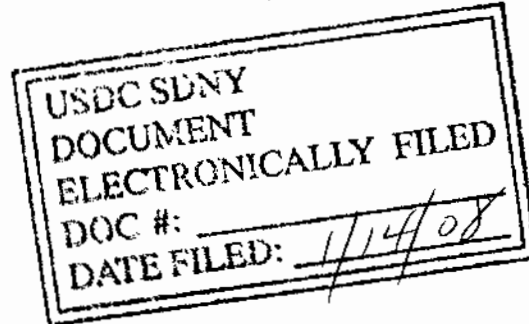
Leonard F. Joy
Executive Director

Southern District of New York
John J. Barnes
Attorney at Law

December 26, 2007

BY HAND

Honorable Loretta A. Preska
United States District Judge
Southern District of New York
500 Pearl Street, Room 1320
New York, New York 10007



**Re: United States v. Martin Amoah
07 Cr. 974 (LAP)**

Dear Judge Preska:

I write on behalf of my client, Martin Amoah, to respectfully request that the Court modify Mr. Amoah's bail conditions to allow him to travel home briefly to Ghana in January 2008. On August 21, 2007, the Honorable James C. Francis imposed the following bail conditions:

- a \$150,000 personal recognizance bond co-signed by three financially responsible persons;
- travel restricted to the Eastern and Southern Districts of New York;
- surrender of any travel documents (and no new applications); and
- strict pretrial supervision.

On September 17, 2007, the Honorable Frank Maas modified Mr. Amoah's bail conditions to reduce the number of signatories on the bond to two, rather than three.

We now respectfully ask that these conditions be modified to allow Mr. Amoah to return briefly to Ghana to visit his mother and ten-year-old daughter. Mr. Amoah's mother, Rebecca Ackon, and his daughter, Angela Amoah, were both injured in a car accident on November 30, 2007. The police report from the accident is attached as Exhibit A. Mr. Amoah's mother is still in the hospital, where she is in critical condition. See Exhibit B (December 10, 2007 medical report from Komfo Anokye Hospital in Kumasi, Ghana). His daughter has been released from the hospital, but is wearing a neck brace and remains in considerable pain. See Exhibit C (December 18, 2007 medical report from Komfo Anokye Hospital); Exhibit D (letter from Janet Amoah, Mr. Amoah's sister, regarding his daughter's current condition).

*The request is denied because of the
risk of flight.
January 14, 2008*

SO ORDERED

Louise A. Francis
UNITED STATES DISTRICT JUDGE

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United States District Judge
Southern District of New York

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Mr. Amoah is desperate to return to Ghana to provide comfort to his daughter and mother.¹ Given the state of his mother's health, he is also extremely concerned that she might pass away before he has an opportunity to see her. We therefore respectfully ask that Your Honor modify his bail package to allow him to return to Ghana for a visit in January 2008, returning well before his next Court date of February 29, 2008. Mr. Amoah would be willing to meet whatever conditions Your Honor believes are necessary with regard to the trip.

I have conferred with Assistant United States Attorney David A. O'Neil and with Pretrial Services Officer Jason Lerman about this request. Mr. Lerman informed me that Mr. Amoah has been compliant with all his bail conditions and that Pretrial Services does not oppose the request. They would require, however, a flight itinerary, details about where Mr. Amoah was staying in Ghana, and a phone number to reach him. Mr. O'Neil has informed me that the Government does not consent to this request.

Respectfully submitted,



Fiona Doherty
Attorney for **Martin Amoah**
(212) 417-8734

cc: Mr. David A. O'Neil, Esq.
Assistant United States Attorney (by hand)

Mr. Jason Lerman
Pretrial Services Officer (by hand)

Mr. Martin Amoah (by United States mail)

¹ Mr. Amoah's daughter is currently staying with his sister, Janet Amoah. Mr. Amoah's daughter has not had any contact with her own mother for about four years.